

**NQS Level 1 - Food Safety Audit Report**  
**Peanut Corporation of America, Plainview, Texas**  
**January 5, 2006**

The Master Cleaning Schedule is very basic, and does not include a number of items in the plant such as walls, ceilings, air vents, electrical panels, floor drains, etc. All exterior areas of the plant should be added to master cleaning schedules as poor conditions can lead to potential infestations issues. All of these items should also have procedures developed as described above.

**GMPs – Pest Control**  
**Not Complying**

Each device is inspected by the PCO during the site visit. All results are documented on the service reports. The plant should work with the PCO to develop a sheet that documents pest activity in a manner that trends can easily be seen. The sheets should be able to easily indicate problem areas or areas of concerns.

The pest control logs for the past 10 months were reviewed with varying levels of rodent activity noted on every report. The activity was primarily noted on the exterior of the building, but there were also concerns in the interior areas of the building. The pest control reports indicate that the plant has an on-going concern with rodent activity occurring at varying levels. The number of devices originally utilized in the service program was doubled after about 5 months of service. The service reports reviewed also say, "seal all voids around doors to prevent pest entry", without noting for which door is a concern. The PCO has utilized a straight line out to indicate some of the devices are being inspected. Each and every device that is inspected should be marked on the log sheet with an individual mark.

During the audit of the exterior of the building, the following was observed:

- 1) A bait box on north side of building near ramp was missing the top. The rodenticide was on the ground about 2 feet from the stations. There was another bait station installed about 4 feet away from the damaged bait station.
- 2) The partition walls around the exterior compressor room on the south west corner of the building are constructed of 2 layers of metal with about 3 inches of space in-between the layers. The area inside of this wall was easy viewed (due to the way they had been cut off) contained about 8 to 10 inches of dirt, product debris (skins), and mice carcasses.
- 3) Mouse carcass lying near bait station #10.
- 4) 3 mice carcasses and burrows under the grating located near on the wall near the shipping doors.
- 5) 3 mice carcasses in varying stages of decay lying near bait station #11.
- 6) 4 mice carcasses in varying stages of decay lying near bait station #12.
- 7) > 14 mice carcasses in varying stages of decay lying near bait station #13.
- 8) 5 mice carcasses in varying stages of decay lying near bait station #14.
- 9) > 10 mice carcasses in varying stages of decay lying near bait station #15.
- 10) 1 mice carcass in varying stages of decay lying near bait station #18.
- 11) 3 mice carcasses and 1 rat carcass in varying stages of decay lying near bait station #20.
- 12) 5 mice carcasses and 1 rat carcass in varying stages of decay lying near bait station #21.
- 13) 1 mouse carcass in the foam insulation near the corner of the building (area near emergency exit door on the south wall for the pre-clean room).
- 14) Numerous burrows along area on south side of plant where asphalt ends and dirt begin.
- 15) A dead pigeon was lying on the ground near the peanut-receiving door.
- 16) 4 pigeons roosting on the iron support structure inside the skin collection building. The doors to this outside building were hanging open, as the trailer was not completely backed into the building. Based on the feces observed, and by building design, it appears as if bird activity is a problem (and a potential problem) for this building.
- 17) A lot rodenticide was scattered loosely on the ground on the south and southwest exterior of the building.

From my observations during the audit walk through and from the pest control program records, plant management needs to review and revise the current program to incorporate more Integrated Pest Management techniques. This plant has a serious on-going problem with rodents on the exterior portions of the building must be resolved. Although there were no observations of rodents or rodent activity in the interior of the plant noted during this audit, the levels of dead rodents observed, coupled with voids noted around some doorways, indicate there are potential concerns for the interior areas of the plants.

Overall, the current pest control program appears to be less than effective and is unacceptable.

**GMPs - Other**

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**Complying with Major Improvement Needed**

There were no open holes observed in the walls or floors from previous installations, however there were several pipe penetrations through interior walls in the pre-clean room that had not yet been sealed around.

Some of the concrete flooring was cracked and broken. This was in particularly poor condition where previous existing walls had been removed. The concrete at the floor / wall juncture on the west side of the pre-clean room was eroded to a depth of 1 – 2 inches.

The paint is peeling on the walls in the pre-clean room. The areas in the corners of the room seem to be in the worst condition.

The weld on the chute at the peanut dump station in the pre-clean room was broken and in need of repair.

All hoppers for peanut storage and transport are open top vessels. There were no areas of dirt or debris accumulated on overhead piping or conduits above any of these vessels noted during this audit.

The conveyor above the #13 Roka de-stoner had been equipped with a cardboard top held on with duct tape to attempt to control product from blowing into the air and out of the conveyor. This conveyor had also been labeled as #1 using paper and duct tape. This was noted on several different pieces of equipment in the facility.

A delron guide rail cover above the bucket elevator near the raw nut dumper was damaged and coming loose from the equipment.

All sides of exterior of the building are surrounded by asphalt. The areas along the south and west sides of the plant had significant amounts of dirt and product debris piled up along the building. This creates a potential food source and harborage for insects and rodents and should be maintained clean.

All exterior doors were closed with marginal seals in place. There were a number of small gaps noted in the seals of a number of the doors. Each emergency exit door is maintained closed but not locked. Each door utilized for access by plant employees is equipped with a mechanical lock and is of a self-closing design.

Employees currently wear their own clothing and shoes to work in all areas of the facility. Employees wear hairnets and beardnets when in the plant. The plant needs to institute a written uniform policy where no employee street clothes would be exposed to product. The plant should also implement a plant designated shoe program with provisions for keeping the shoes in the plant. Employee clothing and shoes could potentially bring unwanted microorganisms, dirt, and debris into the operation. It was understood that most employees leave their shoes at the plant when not in use. The plant should define guidelines requiring that all plant shoes be kept at the plant when not in use.

There are currently no written plant guidelines for traffic control from raw to further processed. These requirements should include traffic patterns, uniform requirements (needs, changes, etc.), hairnet requirements, shoe requirements, fork truck controls, etc. It was understood that the operators typically work in one area.

The operator in the sizing room that was operating the filler was observed touching the product and then handling the exterior of the new boxes to be filled. The employee was touching product to help top of the box to attain the correct weight. This employee should wear clean gloves to touch product, or an appropriate tool should be designated for this operation.

Two wire brushes were observed near the blanchers (34 B / 34 A) roaster and under the hoppers in the pack out room. Wire brushes can be an excellent source of metal foreign material in a process and should be eliminated.

No non-cleaning chemicals items observed in the plant. The plant does not have a policy for these types of items. All approved non-cleaning chemicals should be included in a written control program that lists the item, the usage point (and amount if appropriate), and the storage location when not in use.

With the exception of 1 electrical transfer / control panel in the pre-clean on the south wall with parts stored on top of it, I did not observe any items being stored in or on locations they did not belong (electrical cabinets, control panels, etc.)

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Wooden handled brooms and other cleaning tools were observed in the plant operating areas. Efforts need to be made to eliminate wood from the product processing areas.

The granulation or sizing room is a separate room located adjacent to the finished product warehouse and has plastic strip curtain doors. There was some peeling paint observed on the housing of the bucket elevator by the sifter in this room.

The plant is in the process of adding an oil roasting line. The roasting equipment observed is in one corner of the finished product warehouse and the bulk infeed dump station (is same room as and) is about 30 feet from the pack-off station for blanched or roasted nuts. This process will need to be reviewed very closely prior to any start up to be sure that raw nuts are isolated from further processed nuts – this includes air flow, traffic flow, etc.

The plant has no documented supplier approval program. There are very few raw materials and packaging materials used in this facility. The plant sources raw materials and packaging materials from supplier that have long-term relationships with PCA and the other operating facilities.

**Bio-Security**

**Complying with Major Improvement Needed**

The plant does have a brief general plant safety policy. The plant has not completed any formal assessment of the site for bio-security. A formal assessment should be completed of the site and appropriate action taken against concerns noted.

No employee is issued any type of identification badge, and there are no electronic locks.

**HACCP (Hazard Analysis Critical Control Point)**

**Complying with Major Improvement Needed**

Management has limited training in HACCP, but understands the basic principles of food safety related hazards. It is recommended that someone in management attend a certified HACCP training course to better understand food safety hazards that potentially occur through the entire product process flow from raw peanuts to finished roasted peanuts. Once complete, the HACCP program can be further reviewed and risk re-assessed. Risk assessment includes safety hazards related to microbiological, physical, and chemical (includes allergens) hazards. Currently the food safety concerns are centered on the physical presence of raw peanuts being handled in the peanut roasting area (microbiological).

Comments / concerns related to HACCP and the current plant design / usage related to concerns for potential microbiological cross contamination with the raw and finished nuts. These items need to be reviewed by the plant / company HACCP authorities.

- The storage, dumping, and cleaning of raw nuts takes place in the pre-clean room. This room has a negative air pressure to the other areas of the plant. The room has a doorway entering into the roasting room, but no door is installed. What check is in place to be sure air pressure is maintained?
- All peanut pieces are moved through the processing equipment via open top conveyors and bucket conveyors. All storage bins and conveyors are designed without any tops. The concern is for potential foreign material to easily enter the product flow.
- Employees wear their street clothes in all areas of the operation. At a minimum, a smock or outer garment should be provided by the plant to create a barrier between the employee clothes and the product being processed.
- There are informal traffic patterns and practices for moving vehicles and plant personnel, but no documented plant guidelines. A formal written control plan for the movement of personnel and equipment for the prevention of raw / further processed product contamination needs to be developed. This should include requirements for work assignments and personnel movement, uniform control / changes, hair net usage / changes, glove requirement, cleaning requirements, footwear treatments, etc.
- Raw and blanched peanuts are roasted and / or blanched on specific equipment that has been installed on a shared line. The roaster is used to transport peanuts to the blanchers when the plant is blanching, and the blanchers are by-passed when roasting. The conveyors after these are share pieces of equipment. No

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microbiological studies have been completed to show that no risk is present on these shared pieces of equipment.

- No environmental sampling program is in place or has been completed to provide information on the potential microbiological risks or concerns in the further processing areas.
- The plant is in the process of installing an oil roasting system in a corner of the finished product warehouse. The peanut dumping station for the oil roasting system is being installed in the corner of the roasting / blanching room about 30 feet from the pack-off station for roasted / blanched nuts. By design, blanched only raw nuts will have to be transported to, and then dumped, in the roasting / blanching room.

**Pathogen Monitoring of the Production Environment**  
**Not Complying**

There is currently no environmental pathogen-monitoring plan. There has been no pathogen-monitoring plan completed to provide historical information to justify the discontinuance of an environmental monitoring program for the operating areas of the facility.

A plan needs to be developed and implemented. If needed, Nestlé can provide recommendations for an appropriate sampling plan.

**Formal Release / Status Control System**  
**Complying with Major Improvement Needed**

There is no documented "formal" release system in place; however, practices appear to be in place to prevent any out of compliance materials from being shipped.

It is recommended that a formal release system be created with appropriate procedures and a formal release checklist utilizing testing and monitoring that is currently performed. A finished product microbial test is a good test to use as a finished product release criteria.

**Lot Traceability, Lot Identification, Coding / Recall & Crisis Management (Mock Recall)**  
**Complying with Major Improvement Needed**

It was understood that the plant conducted a mock recall during 2005, but no documentation was completed. No documentation is equal "did not happen". This does not meet Nestlé requirements.

PCA needs to develop and implement a workable protocol for conducting mock recalls and then it on a regular basis. The requirement is to be able to accurately locate and account for any lot of raw material or primary packaging material used from receipt through usage and finished product and on to the transfer of ownership of the finished goods. To be in compliance this must be completed within 2 hours. Further, a program must be in place to perform mock recalls and traces yearly and to analyze the results of the tests.

**Instrument Calibration (for CCPs) / Laboratories and Test Method**  
**Complying with Major Improvement Needed**

The time/temperature recording devices and the thermocouples for the roasting line should be on a minimum annual calibration verification program by the vendor. These devices were originally calibrated by the manufacturer and have been operating for about 9 months. A written program needs to be established to be sure these devices are inspected / calibrated at least annually, or as needed.

The metal detection systems for the roasting / granulation lines should be on a minimum annual calibration verification program by the vendor. These devices were originally calibrated by the manufacturer and have been operating for about 9 months. A written program needs to be established to be sure these devices are inspected / calibrated at least annually, or as needed. The quality control technicians verify the operation of these units prior to start up each day and then on an hourly basis throughout operations.

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The magnets for the roasting line should be inspected annually for pull strength. A written program needs to be established to be sure these devices are inspected / replaced annually, or as needed as indicated by test results.

**Reference attached Detail Findings List for specific points noted during the audit.**



"NQS AUDIT CAR  
SHEET v4.xls"